

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|  |   |                                 |
|--|---|---------------------------------|
| James Smith and Jerry Honse, on behalf of  | ) |                                 |
| themselves and all others similarly        | ) |                                 |
| situated, and on behalf of the Triad       | ) |                                 |
| Manufacturing, Inc. Employee Stock         | ) | Civil Action No.: 1:20-cv-02350 |
| Ownership Plans,                           | ) |                                 |
|  | ) |                                 |
| Plaintiffs,                                | ) | JUDGE RONALD A. GUZMAN          |
| v.   | ) |                                 |
|  | ) | MAGISTRATE JUDGE YOUNG B. KIM   |
| GreatBanc Trust Company, the Board of      | ) |                                 |
| Directors of Triad Manufacturing, Inc.,    | ) |                                 |
| David Caito, Robert Hardie, Michael        | ) |                                 |
| McCormick, Elizabeth J. McCormick,         | ) |                                 |
| Elizabeth J. McCormick Second Amended      | ) |                                 |
| and Restated Revocable Living Trust,       | ) |                                 |
| Michael K. McCormick Second Amended        | ) |                                 |
| and Restated Revocable Living Trust, David | ) |                                 |
| M. Caito Revocable Trust, and First        | ) |                                 |
| Amended and Restated Robert Hardie         | ) |                                 |
| Revocable Trust,                           | ) |                                 |
|  | ) |                                 |
| Defendants.                                | ) |                                 |
|  | ) |                                 |

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**JOINT STATUS REPORT REGARDING THE NEED FOR EXPERT DISCOVERY**

Plaintiffs James Smith and Jerry Honse (“Plaintiffs”), and Defendants David Caito, Robert Hardie, Michael McCormick, Elizabeth McCormick, the Elizabeth J. McCormick Second Amended and Restated Revocable Living Trust, the Michael K. McCormick Second Amended and Restated Revocable Living Trust, the David M. Caito Revocable Trust, the First Amended and Restated Robert Hardie Revocable Trust (“Triad Defendants”), and GreatBanc Trust Company (collectively with Triad Defendants, “Defendants”), jointly submit this Status Report pursuant to the Court’s May 2, 2022 Order directing the Parties “to file a joint status report by September 16, 2022, advising the Court whether they require expert discovery.” ECF No. 115.

**I. Expert Discovery**

The Parties respectfully advise the Court that they do require expert discovery. The Parties jointly propose the schedule below for a motion for class certification and expert discovery.

| <b>Event</b>                      | <b>Proposed Deadline</b> |
|-----------------------------------|--------------------------|
| Motion for Class Certification    | November 2, 2022         |
| Opposition to Class Certification | December 7, 2022         |
| Class Certification Reply         | January 6, 2023          |
| Opening Expert Reports            | February 15, 2023        |
| Rebuttal Reports                  | March 29, 2023           |
| Close of Expert Discovery         | April 28, 2023           |

Dated: September 15, 2022

Respectfully submitted,

/s/ Mary J. Bortscheller

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